

Ann Moore submission 8 December 2024

Our house is 137m from the solar land boundary (LSBP figures) on Koorringaroo Rd, Gundry.

I object to the proposed solar installation for the following reasons.

Goulburn has been designated as a **regional city**.

The State Environmental Planning Policy (Transport and Infrastructure) 2021 (SEPP) provides as follows:

“2.42 Determination of development applications for solar or wind electricity generating works on certain land.

(1) **This section applies to development in a regional city** for the purposes of electricity generating works using a solar or wind energy source that is—.

(a) State significant development, or.

(b) regionally significant development. .

(2) Development consent **must not be granted** unless the consent authority is satisfied that the development—.

(a) **is located to avoid significant conflict with existing or approved residential or commercial uses of land** surrounding the development, and (b) is unlikely to have a **significant adverse impact** on the regional city's —.

(i) **capacity for growth**, or

(ii) **scenic quality and landscape character**.

(3) In determining whether to grant development consent, the consent authority must consider measures proposed to be included in the development to avoid or mitigate conflicts referred to in subsection (2)(a) or adverse impacts referred to in subsection (2)(b). “

The proposed Lightsource BP (LSBP) solar farm does not comply with the above requirements including mitigation measures and should be rejected.

The following submissions set out the significant conflict with existing and approved residential uses of the land surrounding the proposal and commercial uses in the form of

small farms and hobby farms which produce stock and wool for the Australian and overseas market in spite of their small lifestyle size.

- Goulburn is the wrong site for a solar farm. It does not have suitable climatic or physical topography suitable for a solar farm. The Bureau of Meteorology has recorded the following statistics for Goulburn. Between 1971-2000 Goulburn had an average of 139.6 cloudy days a year and 81.6 clear days. Not sunny days, just clear days. Between 1981 to 2010 Goulburn had 133 cloudy days and 93.1 clear days. Between 1991 and 2020 an average of 127.7 cloudy days and 99.5 clear days.

The Gundry Plains, less than 10kms from Goulburn therefore does not offer good solar resources as any one who lives on the Gundry Plains will attest to especially those with roof top solar. We have regular fogs throughout the year including Summer and the solar production in Winter is negligible. Today, the 4.12.24, it is 9.10am and we can only see 300m from our house. The solar land is completely covered in fog and we cannot see Windellama Rd to the West or the end of our block.

- LSBP *did not* consider sensitive viewpoints such as residences and public viewpoints and the potential for noise and landscape and visual impacts when it selected the site as its employees advised us right at the very beginning that the site had been chosen using a Google map and identifying high voltage power lines. In addition, LSBP's proposal to try to build a solar farm on the Gundry Plains became public in April 2022. As at 25.8.23 LSBP still didn't know which properties would be "highly impacted" (their words). *See attached email dated 25.8.23.*
- Approximately 2/3 of the proposed project will be on land that has been mapped under the *SEPP (Transport and Infrastructure) 2021*.
- The proposal cuts through the Gundry Creek which feeds into the Sydney Water Catchment and regularly floods.
- The eastern section of the land is classified as "bushfire prone land"
- This proposal is an enormous change of land use from rural residential/lifestyle blocks to industrial, this is a conflict in itself.
- LSBP has identified over 100 residences and families impacted by the proposal – see Appendix 3 and a neighbouring property immediately adjoining the proposal to the south has approval for subdivision into 20 lifestyle blocks. The proposal conflicts

with the future development of the Goulburn Mulwaree Council area which aims to provide housing opportunities for existing and future residents. Goulburn is situated 2 hours from Sydney and 1 hour from Canberra. Over 2000 people commute to Canberra each day for work.

- LSBP definitely has no social licence to build this installation amongst so many life style blocks and hobby farms
- The very real issue of fire significantly conflicts with the impacted residents' ability to live without fear of a fire that cannot be fought until it is on their doorsteps and the safe use of their land which will be subject to increased risk of fire as admitted by LSBP in its brochure sent out after the March drop in session.
LSBP is only able to provide one emergency fire access onto a public road which shows just inappropriate the site is for a solar farm. The many issues relating to fire is just one reason why the Gundary Plains, with all its residents, is the completely wrong place to build an industrial installation like this.
- Mental health – The proposal has seriously affected the mental health of many of the residents including the worst scenario possible.
- Property depreciation.
- Serious potential health hazards caused by our domestic tank water being contaminated by waste matter from the construction site and in the future, in particular from toxic debris created during any sub-station, battery or inverter fire.
- Permanent environmental impacts on the land conflict with the residents enjoyment of their land and their current enjoyment of the landscape provided by the solar land which they all overlook.
- Lies about jobs for Goulburn

RESPONSE TO PROPOSED GUNDARY SOLAR FARM BUSH FIRE ASSESSMENT REPORT - June 2024 (EIS – Appendix 17)

If the solar farm is approved and a fire from the Solar Farm is unable to be fought due to the extreme physical constraints imposed by the installation including the nature of the fire including sub-station, battery and inverter fires, the 8 foot high perimeter fence,

660,000 panels and only one emergency access over 1650 acres, and people are killed and injured and property is damaged, LSBP, the Sydney Banker absentee land owner, and the State Government will be liable. The Black Summer fires that did so much damage in 2019/2020 must not be forgotten.

LSBP has identified over 100 families that they perceive will be impacted by the proposed solar installation within a 4km radius including the families on Kooringaroo Rd. Over 60 families live on the boundary, next door but one or over the road to the proposed installation on mainly rural residential lifestyle blocks and hobby farms. **It is not flat land. The proposed solar installation is on hilly land rising from 620m to over 700m.** It is contained by properties on **Windellama Rd** on the western side and approximately 42 properties on **Kooringaroo Rd** on the eastern side. . At one point the northern boundary of the proposal near Kooringaroo Rd will be 137 metres from the bedroom of one family.

LSBP admits on page 5 of its Executive Summary in the EIS that the region “..is prone to bushfires.”

KOORINGAROO RD, GUNDARY

Kooringaroo Rd, a dead end, has been deemed unsuitable for an emergency exit road by the Goulburn Mulwaree Council and NSW Fire and Rescue. And LSBP has been told this but continues to rely on it to justify the proposal.

LSBP's Bush Fire Assessment Report (the Report) has failed to address the serious and real issue of the safety of the residents on Kooringaroo Rd when a fire starts in the sub-station, battery or under the panels of the solar farm or burns onto the solar farm blown by a westerly or nor'westerly wind. **Kooringaroo Rd is in a mapped bushfire prone area** as are a significant number of the impacted properties identified by LSBP. The road is approximately 11 kms long and comprises approximately 2 kms of very thick Australian bush at its beginning and 6kms at the southern end. The road is a **dead-end** and would become a death trap if a fire came off the solar factory. It is a mediocre 1.5 lane tar road from Mountain Ash Rd to number 297 (except for one small section) and single lane dirt from number 337. There is no exit/entrance from/to Kooringaroo Rd other than Mountain Ash Rd at its beginning and if the road is blocked by fire or a fallen tree anywhere along Kooringaroo Rd you cannot get out and NSW Fire and Rescue and

the RFS cannot get in. Kooringaroo Rd twists and turns with blind corners and there are three very small bridges that will not permit two vehicles to pass in opposite directions and one of these bridges is a blind dog leg. Two of the bridges flood.

Residents will not be able to escape to the west because of the fence around the solar factory and they would also be travelling into the fire. There are no exits from Kooringaroo Rd on the east or southern side. We have been told by the RFS that the existing fire trails are not suitable for cars and by residents that the fire trail gates are locked.

Most of the residents at the southern end cannot see the Gundry Plains because of the thick bush which has not burned for many years. The bush comprises she oaks, Eucalypts, understorey shrubs, leaf litter and branches waiting to fuel a fire. LSBP has provided no provision for warning these residents that a fire has broken out or has burned onto the solar factory. The residents are unlikely to be aware of a fire until it is too late. The mobile reception at that end of the road is terrible.

The fire fighters cannot get onto Kooringaroo Rd from the solar installation because of the perimeter fence, that is, if they have been able to cross the Gundry Creek near the Windellama Rd. entrance which regularly changes its size. The Windellama Rd entrance would be the only access available to fire fighters but NSW Fire and Rescue has expressed its doubts about whether it could get its trucks across the Gundry Creek. The local fire brigade has said it will not let its fire fighters onto the solar farm as it will be too easy to get trapped.

The prevailing winds across the Plains are west to north westerly which would quickly push a fire onto Kooringaroo Rd. We all know that Goulburn winds are frequent and fierce. In September 2024 BOM recorded gusts of 96 kph. On 18.11.24 we are experiencing westerly gusts of 43kph. This is not unusual on the Gundry Plains.

In April 2023 the Beryl solar factory near Gulgong caught fire. The media article stated that it was not clear what had caused the fire which was under the panels. It took 20 minutes for the fire crews to get to the site and 4 hours to put the fire out. The NCA

NewsWire (24.4.23) stated that the fact that the fire was under the panels made it hard to fight.

At Finley on 4.1.22 the Finley solar factory caught fire. "...attending crews chose to attack the fire from outside due to safety concerns." (Shepparton News 4.1.22)

In November 2015 a grass fire on Garroorigang Road, Goulburn burnt 60ha on a day when the winds were westerly. The fire fighter interviewed in the article in the link below stated that *"The local RFS crews did an outstanding job in stopping the fire before it [reached] the Gundry plains, which could have been disastrous, given the low humidity and high wind speed."*

Goulburn Post 14.12.15

<https://www.goulburnpost.com.au/story/3554348/conditions-can-change-all-of-a-sudden-says-rfs/>

The LSBP Report has failed to acknowledge that there are nine residences next to (within 500m, next door but one to (within 800 to 1000m) or in very close proximity to the sub-station proposed to be built on Windellama Rd, five with young children and another one with visiting grandchildren,. A sub-station fire is a real possibility.

On Sunday 9.10.22 a fire started in a transformer at the Canyonleigh substation near Goulburn/Gundry. The emergency crews that attended had to wait a number of hours before they could access the property.

As advised to us on 14.10.22 by the RFS, the fire was still burning on 14.10.22. We were told that transformer fires are difficult to extinguish and control. The temperature of oil fires ranges from 960 to 1200 °C.

The officer from RFS Southern Tablelands Zone (one of the brigades attending) told us that, once those fires grew to a certain size, the retardants that they normally use become ineffective and that the only way that the fire could be controlled was to cool it down by spraying a lot of water on it. He said that the issue with fires on solar installations was the fact that very high voltage was involved and that specialist information was required. The amount of water that LSBP has provided for i.e. 180,000 litres of water would last for only 4 hours. They have provided no water tank anywhere near the battery.

The release of oil and/or the water used to cool the burning oil in a sub-station fire on Windellama Rd would cause major environmental pollution of the Gundry Creek flood

plain which is part of the Sydney water catchment and runs through a number of properties.

For general information about the fire see the Goulburn Post link below:

<https://www.goulburnpost.com.au/story/7934936/emergency-crews-attend-substation-fire-emitting-cloud-of-black-smoke/?cs=181>

This was the second sub-station fire in NSW in 2022.. There was a substation fire at the Tallawarra Power Station in Yallah in June 2022 and it impacted nearby residents in Wollongong, Unanderra and Shellharbour. Paul Baxter of the Fire and Rescue NSW described it as “a large Transgrid 33 KV (sic) transformer, **a very dangerous operation**, ...” (see link <https://wattclarity.com.au/articles/2022/06/18june-transgrid-330kv-substation-at-tallawarra-power-station-on-fire/>). 16 Fire trucks attended but were unable to enter the site until they could confirm the power had been shut off and some 60 fire fighters attended along with Police and Ambulance. Details were on ABC Illawarra.

The sub-station proposed for Gundry is the same size as the one at Tallawarra.

This type of fire has many real and significant health risks for families on (amongst others) Windellama Rd, Kooringaroo Rd, Mountain Ash Rd, Shaw's Creek Rd and Goulburn City as they would be affected by potentially toxic smoke/discharge from any sub-station fire depending on the direction of the wind. In addition, human life, property, stock and our native animals, reptiles, birds and vegetation would also be at risk should a sub-station fire start a grass fire on the Gundry Plains on a day of westerly winds, easterly winds or southerly winds.

The report **has completely failed** to properly realistically assess the impact of the toxic smoke and fumes from a sub-station or battery fire and their impact on the neighbours and the residents in Goulburn which, as the crow flies is approximately 5 kms away. Stock, domestic animals and our soil and water supplies including household drinking water will also be affected. We refer to the **attached** Safety Alert No. SA-15-23 from QLD Fire and Emergency Services dated 21.11.23 which details the issues arising from fighting fires on solar farms including toxic gases. The Safety Alert states: “Self Contained Breathing Apparatus (SCBA) must be worn when working around burning solar panels and BESS due to the highly toxic gases. Under no circumstances

should an officer go into the smoke or approach a fire without the correct respiratory protection. “

LSBP has made no provision for protecting the neighbours from the effect of these toxic fumes which will be blown every which way by the Goulburn winds. There is no provision for providing us with safety breathing apparatus. **They have conveniently ignored this problem.**

COMMENTS ON THE BUSH FIRE ASSESSMENT REPORT - JUNE 2024 ITSELF.

The mistakes, omissions, untruths and ignorance shown in this report reflect on the credibility of the report as a whole and LSBP's intentions with respect to protecting neighbouring properties from fire including properties within the 4km radius identified by them as being potentially impacted by the proposal. Examples and comments follow.

LSBP has made no provision to protect our house on Kooringaroo Rd which is 137m from the boundary of the solar installation and which they have marked as Bushfire Prone Land Vegetation Category 1. They have made no provision to protect the 3.7kms of boundary that we will have with the solar installation if it is approved. Our house can be seen in Figure 3b to the left of the land marked “(Forest Grazed)”. The house is the bottom building. They have provided no fire fighting equipment that could be easily accessed by us or fire fighters. We would not be able to fight a fire from the west, nor'west, south or south west until it was our side of the solar farm perimeter fence. The land then runs up hill to our house which will accelerate the speed of the fire.

Figure 7 – Our comment - The map of bushfire prone land map has been cropped and deliberately reduced so that the extensive bushland area to the east of the solar land is not shown. That bushland runs to the coast and takes in Bungonia which could be wiped out if a fire from the solar land burned onto Kooringaroo Rd and thereafter into the Bungonia National Park. See map Figure 4-1 in Appendix 11 to see how close the densely wooded Ranges to the east are to the solar installation on the eastern side. A fire in 1985 burned from the west of Windellama Rd onto the Gundary Plains, killing a minimum of 1500 sheep on one of our impacted landowner's farms, stud Merino rams, cattle, badly burning two firefighters, burning Kooringaroo Rd and burning onwards towards the Coast.

FIGURE 3A – Our comment – The comments on this map are incorrect and misleading. The area of land named “Forest Grazed” is on our property at Kooringaroo Rd and is not grazed. It has been specifically set aside for wildlife and native plants.

FIGURE 3B – Our comment – The comments on this map are incorrect and misleading. The area of land named “Forest (Grazed)” and the larger portion second from the left titled “Woodland (grazed)” are on our property at Kooringaroo Rd and are not grazed. They have been specifically set aside for wildlife. The area is fenced off so that no exotic animals can access it.

Figure 6 – This map of vegetation is incomplete. There is a stand of approximately 100 Argyle Apples (*Eucalyptus Cinerea*) on the solar land that adjoin the Argyle Apple corridor that runs from 384 Kooringaroo Rd through 400 Kooringaroo Rd and then onto the solar land adjoining the southern edge of the land marked “Woodland (grazed)” on Figure 3B near the dam. This has been ignored by the writer which again suggests that his report is a desk top report as the same omission was made in a previous report by one of LSBP’s consultants.

In addition, this map does not show all the 2000 trees planted by the previous owner, Greening Australia and Rivers of Carbon in around 2018/2019, running from North to South in the DP 1238347/DP870101 of the solar land.

Figure 7 – this map is misleading as it does not show the true extent of the bushfire risk to the area to the east of the solar land nor the residences in this area. It has been deliberately cropped. It does not show the approximately 40 residences on Kooringaroo Rd up to no. 1100 Kooringaroo Rd. The residences from approximately 532 Kooringaroo Rd (southern end of Kooringaroo Rd) are in thick Australian bush that has not burned for many years and will burn like a tinder box. *See attached Fire map* titled “Fire Prone Land BP2022” showing the true extent of the exposure of this area to extreme fire risk. Please look at a Google image of this area taking in Bungonia (very close to the end of Kooringaroo Rd) and extending to the coast.

A fire started in Chatsbury north of Goulburn in 1965 and destroyed the villages of Tallong and Wingello to the north east of Kooringaroo Rd. It was called the Chatsbury/Bungonia bushfire and was believed to have started by an angle grinder. The

fire reached close to Nowra before it was contained or burnt itself out. Three people were killed as well as many livestock.

At the northern end of Kooringaroo Rd the residents will be unable to escape if a fire starts in the battery (Centralised AC Bess) and is pushed by our very strong Goulburn westerly winds. If the wind blows from the south the residents on Kooringaroo Rd, Shaws Creek Rd, Mountain Ash Road and eventually Goulburn City will be in the path of the fire.

Paragraph 2.1 - Scope of Works (page 16) - the report says "Emergency access point via the existing entrance off Kooringaroo Road proposed on the east (for emergencies only)". This is incorrect. LSBP know full well that the Goulburn Mulwaree Council has told them that Kooringaroo Rd cannot be used as an emergency exit because of its physical constraints which are set out elsewhere in this submission.

Paragraph 2.1 - Scope of Works (page 16) - the report says "Perimeter security fencing with **emergency access points (via gates)**, a 10 m Asset Protection Zone (APZ) and dedicated non-combustible water tanks with a combined capacity of 180,000 L distributed throughout the Project Area." The report however does not state that there is no public access to the solar land other than on Windellama Rd and that therefore the proposed emergency access points provide access onto the private land of neighbouring properties. Have those landowners been asked? What sort of liability does the emergency access impose on those landowners? (There is a physical deformity near the proposed access gate to our land that we know about and avoid but strangers would not and it is not obvious and could injure a person or damage a vehicle badly). Who is going to reimburse the neighbours for the work and fuel involved in keeping the access gates clear and whose responsibility is it then to make sure the escapees can get to safety? Who is going to pay for a formed dirt emergency access road of the required standard to be built on the neighbouring properties. **This is LSBP's responsibility, not the neighbours'. LSBP's agreement for the solar land use is with the Sydney landowner, not the adjoining Goulburn neighbours.** LSBP has not spoken to the neighbouring landowners about these emergency access gates. **It is not the responsibility of the neighbouring landowners to provide emergency access just because LSBP has chosen a completely inappropriate place to build a solar farm.**

If LSBP cannot provide emergency access onto a public road it further confirms that the site is completely inappropriate for a solar farm.

Paragraph 2.1 - Scope of Works (page 16) - the report refers to water tanks with a combined capacity of 180,000 L distributed throughout the Project Area. According to NSW Fire and Rescue information this would only cover 22.5% of the solar land. We are required to hold 20,000 litres in our dedicated tank to fight fire in our BAL 29 rated house only, not the land surrounding it. The volume of water proposed is completely inadequate. As the land on which this proposal rises from 630m to 710m and is hilly, how will the firefighters see where the gates and tanks are.

Paragraph 2.3 (page 17) – the report states “A perimeter access maintenance track will not be provided around the development due to constraints, however the proposed 10m wide Asset Protection Zone will be present around the whole of the project boundary.” If they cant build a perimeter access track around the development “due to constraints” how will they build a 10m fire break? This is contradictory.

Paragraph 2.5 - Construction standards (page 18) – the statement by Umwelt that “However, given the adjacent land is typically unoccupied (farmland) ..” is incorrect and appears to be deliberately misleading and once more indicates that the writer of that report has not visited the area and that the report is a desk top job undertaken by someone with no knowledge of the area and who did not make the effort to visit the area. I refer to the Umwelt map 6.16 on page 204 which shows that almost every block of land surrounding the solar land has a residence on it except for the subdivision to the south which has 20 blocks approved for sub-division. In addition to these are the residences on the other side of Windellama Road to the west of the solar land.

Paragraph 2.6 - other fire protection measures/emergency evacuation – The report states: “In regards to bushfire, *the threat at this site is considered low, being limited to potential Grassland fires, and possible ember and smoke attack* assuming the Asset Protection Zone is maintained over the site and surrounds.” This statement shows a complete lack of knowledge of the behaviour of grass fires and the fact that once a fire reaches Koorngaroo Rd it will burn dense bush potentially to the Coast.

The Climate Council at <https://www.climatecouncil.org.au/resources/grass-fires-follow-floods-heres-what-you-need-to-know/>

states “

“Grass fires are fundamentally different to a bushfire and are generally less intense but equally as dangerous. Grass fires occur in grassland areas where the dominant vegetation is grass, and are unpredictable, start easily and spread quickly – up to three times faster than bushfires. They can move at up to 25km/hr (far too fast for a person to outrun), and pulse even faster over short distances.

“Fully cured grasslands can dry out rapidly and ignite within hours of rain ceasing. Dead grass serves as a ‘flash fuel’, and grassy landscapes with high air flow provide plenty of oxygen to feed a fire. Resulting fires can be influenced strongly by changes in wind speed and direction, making them very dangerous and difficult to control on days of serious fire danger.”

The writer of the LSBP report has obviously never fought a grass fire. Embers from a grass fire on the solar land will quickly be blown onto surrounding properties which will ignite the grass there. Our land and land around us has very good pasture cover at the moment that will dry off in January/February and be ripe for a fire from whatever source. In the last few days (end of November) we have had 36mls of rain that will result in increased growth of pasture.

SUMMARY

The Bush Fire Assessment Report does not acknowledge the number of residences that will be impacted when a fire starts on or burns onto the solar farm. The report deliberately ignores the serious issues surrounding the residences on Kooringaroo Rd and the state of the road. The report provides no assistance for the families close to the sub-station on Windellama Rd and boundary on Kooringaroo Rd and in the report LSBP abrogates its responsibility to provide emergency access for fire fighters and emergency exits onto public road because this is just not possible because of site location. The perimeter fence makes it impossible for all neighbours to fight any fire until after reaches their boundaries.

MENTAL HEALTH OF NEIGHBOURING AND IMPACTED LANDOWNERS.

LSBP definitely has no social licence to build this installation in the middle of the Gundry Plains amongst so many life style blocks and hobby farms and for this reason, amongst many, their application must be rejected. The conflict of this proposal with the mental health of the impacted families is unbelievable.

The current landscape in which the families impacted by the proposed Gundry solar factory live comprises undulating hills, flood plain and valleys depending on where we live.

Until we became aware of the proposal Gundry we lived quietly at Gundry, asking nothing of anybody and expecting to live here until we either died or moved into town. We all regularly contribute to Goulburn's economy as it is our main centre. Most of the blocks are lifestyle blocks/hobby farms in addition to a couple of bigger farms, one of which has approval for sub-division into 20 blocks of 100 acres each, to the south of the proposal.

Since being made aware of the proposal our lives have been turned completely upside down. The situation has caused unbelievable stress and anxiety to all our families. Instead of thinking normal everyday thoughts our thinking has become saturated with the impact the solar factory is going to have on us visually, financially and health wise. This has had a serious impact on our mental health. We go to bed and lie awake thinking of it, we wake up in the night and our thoughts immediately jump to how we are going to cope with watching the beautiful Plains being ripped up by bulldozers and excavators, and the first thing we think of when we pull up the blinds is the fact that the extensive view we can now see may be gone in two years time replaced by 660,000 glass and metal panels and 164 individual dirty looking batteries.

We struggle to cope with the fact that our futures have been destroyed by a foreign company, British Petroleum (LSBP), which obviously had no idea as to the number of people affected by the proposal and now went back out. **We refer to the email from LSBP dated 25.8.23, almost 18 months after the proposal was made public in which they admit that they still did not know how many properties would be highly**

impacted. They were supposed to have done this prior to choosing the site, as per the SEPP. They told us at the beginning that they had based the site on the grid and the presence of high voltage power lines in one corner of the proposal, using a Google map.

In addition to this is the fact that our current and future financial security has been ripped from us as the value of our homes has plummeted or the home has become unsaleable.

LSBP has lied to the affected land owners from the beginning in relation to their supposed concern for the extreme mental health issues being experienced by many of the badly affected landowners. BP has been well aware from the beginning that a number of land owners have been suicidal. We have an email from Umwelt, LSBP's consultant dated 6.5.22 acknowledging this which states:

"Thanks for letting me know about this. The discussion around mental health and suicide has come up in a few conversations so far and is absolutely something I am taking seriously, will reflect seriously in the SIA and am discussing genuinely with Lightsource bp. Similarly, impacts on property values is something that will be part of the SIA report." (The email has not been attached as it goes on to mention people's name in relation to another matter.)

LSBP's strategy in the EIS to address suicidal tendencies and continuing crippling anxiety is completely inadequate i.e. "Lightsource bp will collaborate with other local developers to minimise where possible cumulative social impacts associated with renewable energy development in the area and will continue to engage with local landowners and residents regarding Project implementation and information provision. (*What does that mean and how would that help??*) The Project will share and connect people to local services to support mental health." Why haven't they "shared and connected" prior to this? We have been asking for help for over 2.5 years and the only response we received was a list of organisations such as Beyond Blue. At no time has LSBP offered psychological counselling to us although they have frequently been made aware of the issue including a letter to their CEO, Adam Pegg, who couldn't be bothered to reply. In a day and age when we are all supposed to be asking each other whether we are "OK" LSBP couldn't even answer letters from impacted landowners about the issue. And NO we are not OK!.

My husband and I were told by the person concerned at one stage that that person had spent the previous couple of days planning how to kill themselves. For various reasons they didn't do it. Hearing this was like being punched in the stomach. The family moved because of the unbearable impact of the proposal of their family and suffered a 36% loss on the sale of their property. They would have had a 218 degree view of the solar panels rising from 630m on the Gundry Creek up to 713 metres on the hill in front of them. No landscaping would hide this.

The Gundry Plains has to be one of the most beautiful rural landscape areas in NSW and every single one of us knows their land back to front and inside out and looks after it and the animals, insects, reptiles and birds on it. The animals here are so at home with the residents that one of the affected families on Windellama Rd had Wedge-Tailed Eagles nesting in their pine trees near the house for two years. We have been told by the local Council that this is very unusual. I have attached a video taken on 26.11.24 of an Echidna walking past our house approximately 20m from the building. It stopped when it saw me and then kept plodding to wherever it was going. This why we love living here. This animal felt safe enough to walk near humans across an open grassed area in the day time. Umwelt, the consultant used by LSBP did not mention Echidnas in their environment report. Because they did not see any, they didn't exist.

The only thing that keeps many of us going is the fact that we have each other. The landowners group is made up of honest, good, thoughtful people who look out for each other and who would never impose something like this on their neighbours nor expect any one else to have to live next to or near it.

It is interesting that the Sydney banker (who has never lived in Goulburn) who is leasing his land to LSBP for the Gundry solar factory did not feel that he could meet with the people whose lives he is impacting so badly. If the project is approved he will receive millions of dollars for his leased land over 40 years. **What will we get for the next 40 years?**

PROPERTY DEVALUATION.

The proposal has already affected the value of our properties, some of which have mortgages over them and others that are our superannuation. The family who moved away for mental health reasons lost 36% on their sale which was to buyers who did not want to live there but wanted to use the land for stock. This was in addition to having to shut down their very successful business which they had built up over 10 years. The business had an inter-state reputation.

An older person who is right next door to the proposed sub-station has had their place on the market at the beginning of 2022 and again at the end of 2023. They just want to move to town to be near services. The place has not sold. The owner told me on 3.12.24 that there had been not interest in the property since it was put on the market in 2023. When it was first on the market the solar farm was not known about and after it was made public the owner was told by two potential buyers that they would have made offers but for the solar farm. The landowners have had written valuations from three different real estate agents including a Sydney based agent and they all come up with up to 30% loss in value. One owner has had a valuation which stated a loss of between 30% to 60%. That will be a significant loss for all of us assuming that someone will want to live with solar panels 137m from their bedroom or a 14 acre sub-station opposite their lounge room windows. That is a lot of money that we cannot afford to lose. As has been stated, some of us are paying off mortgages on houses which are now worth very little or which are in fact unsaleable and others have lost the future financial security they were relying on as they got older.

And who would want to live with a sub-station, the massive battery and solar panels within 800m of their house where there are no naturally growing trees which might partially screen the sub-station. Any screen trees planted would not screen the sub-station for many years if at all or probably would not survive as trees on the Gunday Plains are not fast growing due to the acidic soil of which the residents are aware of but other groups would not be. And LSBP thinks that watering tube stock for 3 months will ensure a good survival rate!!

COMPENSATION

The compensation that LSBP has offered to adjoining and very close neighbours is insulting. LSBP has publicised the benefits to the community which it hasn't actually explained but has acted contemptuously towards the families that will be most impacted by the proposal.

Page 16 of Appendix 18 SIA states:

"The Neighbourhood Benefit Sharing Program aims to ensure that residents living closest to the Project can share in its direct financial benefits. ..."

This is completely untrue. If \$5,000 a year for 4 families is the extent of what LSBP can afford from its generation of electricity from this proposal they should pull out now.

Companies such as Engie, the owner of the Plains Renewable Energy Park south of Hay, NSW, was offering compensation to neighbours of their wind farm within 5, 8 and 10kms of the boundary comprising corresponding construction payment of \$15,000, \$10,000 and \$5000 and an annual operation payment of \$15,000 plus \$1000 per turbine, \$10,000 plus \$500 per turbine and \$5000 plus \$250 per turbine i.e. based on distance to wind turbines.

LSBP has offered the following:

(A) Those families whose **houses** are within 500m of the boundary to the solar farm land - \$5,000 yr for 40 years or \$10,000 yr for 20 years. There are approximately 4 of these. It doesn't matter if your house yard has a boundary with the solar farm you will not receive any compensation if your house is not less than 500m from the boundary.

(B) Those **houses** up to 1000m to the boundary of the solar land will receive a one off construction benefit of solar panels and a battery and if they already have a solar system they will receive \$15,000 as part of the Construction Neighbourhood Benefit Sharing Program. It is not a benefit, it is compensation for loss of amenity, view and landscape character. The compensation should include a component for depreciation.

It is quite possible that these payments will be taxed.

The visual impact of 660,000, 3m high panels on hills over 700m high is significantly more visually confronting than individually spread out wind turbines. The visual impact of a 14 acre metal and wire sub-station and a 7 acre battery is overwhelming when you live next door to it, next door but one or over the road.

These payments are also completely inadequate to compensate us for the permanent disruption to and the ongoing conflict in our lives that will occur for the following reasons.

(a) Dirt, filth and toxic dust from panels broken during construction and after construction

- **We all have tank water** and the dirt and muck that will blow off the construction site because of the regular and strong Goulburn winds will land on our roofs and will then be washed into our water tanks. The water in the tanks is our only drinking, bathing, cooking and washing supply. The filters in the tanks cost \$500 each and during construction will have to be renewed every month for the two years of construction. This will cost \$12,000 at today's prices. With the land devoid of pasture cover after the construction, the filters will have to be renewed every four months. That is \$1500 per year. The tanks will have to be vacuumed annually to ensure the water is potable. **This is a health issue that LSBP has not addressed.**

We will also need to hire cleaners to keep our houses clean and free of the dirt that will be created.

(b) Compensation for noise during construction – We will all have to put up with the constant machinery and pile driving noise during construction, in our case 137m from our bedroom. This will be each day including Saturday and at night. On 18.11.24 there was a huge bulldozer digging a big hole in the solar land approximately two kilometres from our boundary with the solar land. The noise, including the constant reversing alarm, was audible in our house even with our double glazed windows closed. What will it be like when we have multiple bulldozers, pile drivers and multiple trucks carting dirt. What will be the impact on our dogs, one of whom is terrified of loud noises, our elderly horses, our sheep and cattle.

(c) Compensation for noise from the running of the facility. The inverters, battery and sub-station will make constant noise. The inverters have air conditioning units working

24 hours a day. Our land is currently so quiet that all you can hear are the birds. That is probably why LSBP's consultants didn't put a noise monitor on our boundary. Another deceitful act.

(d) Compensation for the mental anguish that we are suffering and will continue to suffer if the solar facility is built. LSBP has driven two families away from the Gundry Plains and has made the lives of the rest of us angry, uncertain, frustrated and completely unable to plan for the future. We have asked that LSBP buys out the families who want to sell as **LSBP says that there will be no depreciation in the value of our properties.** If this is correct, LSBP will not lose when it sells them if the facility goes ahead. **LSBP should buy our properties at pre-solar farm value.**

ENVIRONMENTAL IMPACTS OF THE PROPOSED GUNDARY SOLAR INSTALLATION - APPENDIX 7

LSBP has failed to explain how animals and reptiles, trapped when the perimeter fence is built and injured by bull-dozer, truck and workers including echidnas, wombats, kangaroos, large lizards such as the lace monitor lizard and possums, will be put down.

Umwelt had admitted at Paragraph 2.6.2 Page 44 that the survey it undertook had its limitations. How can it then be relied on?

Paragraph 3.2 Connectivity features – “Connectivity between the Subject land and any adjoining native vegetation is through Gundry Creek which would not be directly obstructed by the Project. The construction of the security fence will have minor impacts on the connectivity for fauna near the creek crossings at the boundaries”

This is incorrect. How could they make a statement like this? Do they think that wombats, echidnas and kangaroos, to name a few know that they only have to travel five kilometres and they'll find a wildlife pedestrian crossing? If wombats want to get onto a neighbouring property they dig and lift the fence up. Kangaroos jump over the fence where they want to cross. They won't be doing that with an industrial fence. Wombats and echidnas are very territorial and the ones in the middle and to the west on the land in question, if there are any left after construction, won't be walking all the way to the Gundry Creek to use the pedestrian crossing. How will they be treated by the construction workers?

There is also stand of Argyle Apples on the northern boundary of the Solar land near Kooringaroo Rd which has not been identified by LSBP. The stand is nowhere near the Gunday Creek being at the opposite end of the land. There are approximately 100 trees in the stand which are part of an Argyle Apple Corridor that starts further north on Kooringaroo Rd and runs across no. 400 to the solar land. This corridor is self-seeding and is the home of many creatures that will have their highway destroyed by the perimeter fence.

General comments.

This proposal will place extreme pressure on existing biodiversity on the remainder of the Plains and its removal of habitat will conflict with the ability of native creatures to survive in this area without having to fight over food and fallen logs and trees. That pressure will be made worse if the approved Merino solar farm on Braidwood Rd is approved. 14sq kms of habitat and food sources will be removed from the existing wildlife if both solar farms are approved. Where do they go? Most of them are territorial like wombats and echidnas which are very difficult to re-home.

The Biodiversity Report of Umwelt dated October 2024 is flawed in a number of aspects which reflects on the credibility of the findings in the remainder of the report and on the thoroughness of Umwelt's investigations generally.

- (a) Umwelt has failed to correctly identify the large stand of, in excess of, 100 *Eucalyptus Cinerea* (Argyle Apples) on the northern boundary of the subject land in the eastern corner. This indicates a significant lack of knowledge of the flora species in this area and casts doubt on their other identifications.
- (b) Umwelt/BP failed to carry out a proper study for the Striped Legless Lizard (*Delma impar*) using too short a time frame, restricted methodology and too small a search area.
- (c) Umwelt/BP completely failed to identify many vulnerable bird species (list can be provided) and a number of other species, including a migratory species that have been seen on adjoining properties and whose existence has been supported by photographs
- (d) Umwelt/LSBP has failed to identify the existence of echidnas or wombats on the subject land. When asked why they didn't mention echidnas in their scoping report they said they hadn't seen any. When asked whether they knew what signs to look for, they didn't know. There are many echidnas in this area as any

of the landowners would tell you. See attached video. There are also many wombats who frequently locate from one burrow on our place to their holiday home on the solar land. We know this because of the access holes they have built in the common fence.

- (e) Umwelt has failed to identify the species of birds, animals, reptiles and insects that use the project area as their breeding habitat and has failed to take into account the significance of that habitat e.g. they are planning to destroy individual old trees which have been pruned by the wind and have dropped branches which provide a breeding habitat for possums, birds, lizards and insects. Umwelt has failed to notice this or just don't know. They have failed to physically identify the frogs and turtles that live in the dams on the subject land and are proposing to fill in or fence off most of the dams.

The area contains breeding habitats for many varieties of birds and reptiles but this has not been considered by Umwelt. We have a shared dam with the solar land and it regularly has a multitude of ducks of different species on it and on the surrounding land, not the banks, but the land. We have ducks that build their nests in trees and then bring their ducklings to the dam. We found one a good 1.5 kms from the dam last year. She had got the babies out of their tree nest and was on the way to the dam.

Black Swans are regular "occupants" of this dam, either in pairs or singularly. They stay for a while and then leave. They are regular visitors to the whole Plains. If this dam is fenced in, which it appears to be, the swans will not have enough air space to take off as they are big birds.

ELABORATION OF ABOVE STATEMENTS

Striped Legless Lizard (*Delma impar*) – LSBP has failed to undertake a proper and exhaustive search for this important lizard and its methodology is flawed. The report prepared by Umwelt and dated October 2024 (Umwelt report) states that the lizard was targeted in September to November 2022 when it is still cold in Goulburn and no reptiles are usually seen. For example, on 17 September 2019 we had 6 inches of snow on the subject land and adjoining properties. Umwelt's own data shows that the temperature

when they were looking ranged from 7.4 degrees in September to one day of 19 degrees in November.

We have been advised by an environmental officer at the local Council who was involved in a similar but unrelated search in another area that roof tiles should be placed in a target area in June and then should be looked at in September to November for lizards sheltering under them or evidence of them such as skin. We were informed by the officer that a rock turning survey where at least 100 rocks are turned over should also be done to determine the existence of the lizards in this area. Umwelt has failed to undertake these usual and scientifically proven methods of searching for these lizards and we submit therefore that their results have no validity.

One of the most likely habitats for the legless lizard is on the northern boundary of the subject land. This paddock is full of rocks, a likely habitat for the lizard. Their rarity would indicate that a more exhaustive rock turning search should have been undertaken as, if the bulldozers move in, these rocks will be destroyed as will any lizards. We have been told by an environment officer at Goulburn Mulwaree Council that this would be ideal country and that just because they have not been seen does not mean that they are not there.

The rocks referred to above have not moved since they were deposited. The subject land matches the requirements for legless lizards. Umwelt has previously stated that “The Project Area contains approximately 200.75 ha of degraded but potentially suitable grassland habitats ...”, The solar land is only degraded because of the way its absentee owner farms it. The previous owner had that land buzzing which included planting 2000 trees with Greening Australia and Rivers of Carbon most of which will be bulldozed.

3. Vulnerable bird species not identified by Umwelt/BP

LSBP's consultant has completely disregarded the existence of the following birds and animals that are actually seen by the residents of the Gundry Plains.

- a. *Dusty wood swallow* (listed as vulnerable in NSW by the Office of Environment & Heritage) – seen and heard on adjoining property 137m away from the common boundary. Needs a fallen timber habitat. I have seen this bird.

- b. *Diamond fire tailed finch* (listed as vulnerable under EPBC Act) – frequently seen on adjoining property 137m away from the common boundary. We have photos to prove this.
It lives in “ open grassy eucalypt forest and woodland, heath, mallee country, farmland and grassland with scattered trees.” Wikipaedia .
- c. *Flame Robin* - (listed as vulnerable under EPBC Act) – frequently seen on our adjoining property 137m away from the common boundary. We have photos to prove this.
It is a migratory bird within NSW.
- d. *Varied Sittella* - listed as vulnerable in NSW by the Office of Environment & Heritage) – seen on our adjoining property by a Senior Program Officer for Greening Australia. We have the email confirming this dated 27.10.22.
- e. *White Winged Triller* – “The White-winged Triller is a breeding migrant to southern Australia in summer (August to March)...” Australian Museum. – seen on our adjoining property by a Senior Program Officer for Greening Australia. We have the email confirming this dated 27.10.22.
- f. *Little Eagle* - listed as vulnerable in NSW by the Office of Environment & Heritage) – officially listed sightings in this area (refer to Goulburn Mulwaree Council)
- g. *White-bellied Sea Eagle* - listed as vulnerable in NSW by the Office of Environment & Heritage) – officially listed sightings in this area (refer to Goulburn Mulwaree Council)
- h. *Wedge-tailed Eagle* – These are protected under the *NSW Biodiversity Conservation Act 2016*. We have at least four Wedge-Tailed Eagles that hunt over the solar land and over the Gundary Plains generally. (photos available). **If this solar project is approved and the other solar project on the western side of the Gundary Plains (The Merino Solar Farm) is approved the Eagles will lose 3000 acres of hunting ground.** The birds regularly fly over the solar land and use the old gums on the solar land as a look out post.

Wedge-tailed Eagles are territorial and these Gunday Eagles are so comfortable in this area that they have nested in the pine trees near one of the impacted landowner's house on Windellama Rd. We have been told by the local Council environment officer that this is very unusual.

If the Project is approved, the 14 acre sub-station to be built on Windellama Rd that will be lit up at night, very close to those pine trees, will ensure that the Eagles do not return to these nesting sites.

It is irrelevant to say that these birds are not now vulnerable or endangered. If development is permitted to destroy their hunting grounds to the extent that is currently happening, the birds will soon be endangered. They are very big birds and need a lot of food as do their chicks. They also need a long distance to take off once they have landed on the ground. They are like a Caribou aircraft.

"Between 80 and 90% of a wedge-tailed eagle's diet is made up of ground-dwelling animals, including mammals and reptiles. Rabbits, wallabies and small kangaroos form the main part of their diet, although they will also eat snakes, lizards, large birds, possums, foxes and feral cats. When hunting, the wedge-tailed eagle bears down on its prey in a long, slanting swoop. Nearly all prey is caught on open ground, with the eagle usually feeding on the spot. " (NSW Department of Planning and Environment – on-line 30.7.18)

The sterile environment under the solar panels and the significant amount of land that will be covered by the panels will not provide food or sufficient space for the Eagles to hunt, land and take off. They have a 9 foot wing span.

- i. *Wombats* - LSBP has failed to mention what will happen to the wombats currently living on the subject land. They will run into their burrows when threatened by machinery and will be killed when those burrows are destroyed. LSBP has no plan to protect them.
- j. *Information from other landowners next door to or next door to but one to the solar land.*

The following birds and animals have been identified by our impacted landowners:

Wedge Tailed Eagle family (videos available), Black wallabies, Eastern Grey

Kangaroos, Lace Monitor Lizards, Cunningham's skinks, Brown falcon, Nankeen Kestrel, Brown Goshawk, Sacred Kingfishers, Red belly Black, Tiger and Brown snakes, Brown Quail, Stubble Quail, Rails, Fairy Wrens, Barn Owls, Tawny Frogmouths, Nightjars, Black swans
Many varieties of ducks, Egrets, Herons, Spoonbills, Red Browed finch, Chuffs, Willy Wagtails, Fantails, Yellow faced honeyeater, Ladybeetles and Dragon Flies.
None of the above list has been mentioned by Umwelt in the report which indicates that their searches and surveys were not exhaustive. All of these animals would hunt over/live on the subject land. We have been told by the Environment Officer at Goulburn Mulwaree Council that whatever is found on our place is deemed to be on the solar land.

Ecological Surveys Completed for the Project

Umwelt states at Paragraph 2.1.2 of its report that it did its flora and fauna surveys in September to November 2022.

2022 was one of the wettest and coldest years for Goulburn coming off the drought. Also, lizards and reptiles are not normally seen in this area until November as we have long winters. Once we see lizards we know that the snakes will be about. This is not from a "data base", this is from the experience of the Gundry residents, many of whom have lived here most of their lives.

On 17 October 2022 we saw two persons from Umwelt who told us they were looking for reptiles. It was 9am in the morning, overcast and the top temperature for that date was 9 degrees (feels like 6 degrees). (Weatherzone Data 17.10.22). Undertaking reptile surveys on days of these temperatures was pointless and has resulted in incorrect results.

It would appear that Umwelt/BP have taken most of their data from "data bases". The problem with this is that these data bases are reliant on the public to report sightings which makes the data unreliable, for example, no Lathan Snipes were recorded in the Goulburn area at all however an environment officer with the local Council knew where they lived and eventually included it on one of the "data bases". Everyone acknowledged that they were there but did not realise the need to record the fact. Lived

and seen experience is more reliable than data bases especially when a number of landowners report the same animal/bird/or behaviour.

The Department of Planning, Housing and Infrastructure **is** requested to take notice of the hands on experience and sightings of the adjoining landowners which more accurately reflect the existence of these birds, animals, reptiles and insects. We live with them.

JOBS FOR GOULBURN

LSBP told us right from the beginning including in their letter box drops that the proposal would provide 400 jobs for Goulburn. When we questioned them about this they assured us that it was correct. However, in Appendix 19 they now say Goulburn locals will fill 5% of 250 jobs at peak construction time i.e. **12.5 jobs for Goulburn**. LSBP has built five solar farms in QLD and NSW to-date. They must have known perfectly well the number of jobs likely to be made available to Goulburn locals but again in order to get support for the project they lied to us and to gullible members of the community. How can anyone believe what they will say in their replies to our submissions when they say “We will do this and we will develop that..”. The affected landowners have found out the hard way that LSBP just cannot be trusted and LSBP couldn’t care less. The arrogance of its employees at the March 2024 drop in session, when they were caught out making faces and laughing about landowners they had just spoken to, and in personal meetings reflects that.

RESPONSE TO EXECUTIVE SUMMARY – APPENDIX 18 SIA IN THE EIS FOR THE PROPOSED GUNDARY SOLAR INSTALLTION

We have been told that LSBP is planning to sell the approval if it gets it and does not plan to build or run the proposed solar farm. We do not know if this information is correct however LSBP sold five of its QLD and NSW solar farms at the end of 2023 to the Beijing Electrical Company, a Chinese State owned company so our information fits in with this. We have asked LSBP twice via email whether it is correct and have received no denial or response at all. **It seems unjust that out lives have been turned upside down by a company that isn’t prepared to back its own application.** It will just walk away with the money in the bank and we will be left with the life changing consequences.

LSBP states that *“The SIA process has involved extensive consultation with a range of stakeholders, including the host landholder, proximal landholders and residents...”*

This is untrue. The “proximal” landowners badly affected by this proposal had approximately three meetings as a group and two individual meetings over 32 months. There were also two public drop in meetings where the LSBP employees were unable or unwilling to comment on our concerns. They basically said nothing to answer our questions and often had no answers e.g. one of their senior people was asked three times how do you put out a fire in a solar panel and he could not answer the question. The person who asked the question has experience in the high end electrical industry.

One of the LSBP employees so irritated the landowners that he did not take further part in a number of the few meetings LSBP has held with us.

A community engagement officer was then employed to liaise with us. She was one of the rudest people I have ever met in a professional capacity. She arrived at our house with the photographer who was going to take photos and when I opened the door she just stood on the footpath and said nothing. I had no idea who she was as I had been told three people would be attending the meeting. She did not introduce herself and so the photographer had to introduce us.

This woman said almost nothing during the 45 minutes it took to take her and the photographer for a drive around our property to show her the impact on us except to tell me that her mother had always wanted a baby wombat and ask whether I would like one and on the way back to the house she asked how we knew when to leave the gates to our paddocks with stock in them open and when to shut them.

She was at our place for three hours which were a waste of time. She was supposed to be discussing compensation but it was never mentioned. We came to the conclusion that she had been told to say nothing which is in fact what happened. This is not extensive community consultation.

Unfortunately the original male employee then appeared back on the scene and his impact on the landowners became even worse and culminated in him being threatened by one of the very stressed landowners who could not take his arrogance any longer. LSBP then reported the landowner to the police which has not gone down well with the rest of us. Another landowner told us that during the meeting he had with the young

man and a LSBP senior manager about compensation, the arrogance of the young man made him so angry that if he had been 30 years younger he would have clipped him on the chin. A comment like that was totally out of character.

The young man concerned had absolutely no empathy with the landowners and no understanding of the impact this is having on us mentally and physically.

Adam Pegg, the CEO of LSBP, has always been too busy to reply to any of our letters or invitations to visit the site which he has never visited but has imposed on us.

APPENDIX 18 - TABLE 1.1 - Potential Social Impacts and Opportunities

In the above table LSBP has admitted that:

a. The efficacy of refinements to the layout and on site visual screening may be reduced by the topography and view lines surrounding the Project. The topography includes land that rises from 630m to 710m so the ability to screen 3m high panels on hills that size is non-existent. There is a white water tank on the solar land on one of the hills facing Windellama Rd. The tank is 3m high set on a 710m hill and shows just how intrusive and conspicuous the solar panels will be to all affected landowners but LSBP has only offered compensation to four. A kilometre in a landscape such as the Gundry Plains i.e. open country is nothing visually. You can see every kangaroo, sheep, cow on it as plainly as if it was 20m away. That tank can be seen from a farm on Braidwood Rd, approximately 5 kms away and on Readers Road, approximately 7 kms away so the panels will replace the current landscape vista at these points and will conflict with many people's current view and enjoyment of the area.

b. There will be a need for LSBP to work with police during the construction period and that a code of conduct will be implemented for out of working hours. This is very concerning. Who are the construction workers going to be that they will not know how to behave out of hours? It appears that LSBP has had behavioural problems in relation to their other solar factories. There are five families with young children in very close proximity to the construction of the proposed sub-station and another family that regularly has visiting grandchildren. Nowhere has LSBP stated that the workers will have had a Working With Children Check or criminal record check. Goulburn is a safe town and we want it to stay that way.

c. *There is conflict or reduced cohesion between the affected landowners.* This is offensive to us affected landowners. We are a united group that did not know each other before this monstrosity was imposed on us but will remain friends after this is all over.

d. *There will be Increased pressure on local health care, facilities, and emergency services due to incoming construction workforce.* The Ambulance Station at Goulburn is already understaffed. In order to get a medical appointment it is not uncommon to wait 7 days. We have limited fire fighting services for such a large project and what happens to the neighbours if there is a fire e.g. at Marulan or Tarago and the solar farm catches fire.

d. LSBP should be asked to provide examples for each solar farm it has built of skills training courses it has implemented. Not the money it has given to council but how many apprentices it has trained in its other solar farms.

e. *There will be livelihood impact due to decreased property values and inability to sell proximal properties.* .

LSBP's response is that it " *..has implemented design changes to reduce the visual and noise impacts of the Project. It is also acknowledged that the NSW Government has noted that further information and analysis is needed to respond appropriately and is undertaking further analysis in consultation with the Australian Energy Infrastructure Commissioner, NSW Agriculture Commissioner and the Clean Energy Council.*"

What does that mean?? What does the Australian Energy Infrastructure Commissioner, NSW Agriculture Commissioner and the Clean Energy Council have to do with property depreciation? LSBP has always refused to acknowledge that our properties will/ have been devalued. As it has now acknowledged this, it must give appropriate compensation according to the depreciation in value, up to 100% for at least one home that has been on the market and cant sell. In the alternative they should buy our properties.

e. *There will be livelihood impact due to increased insurance premiums for neighbouring properties.* The solar farm is costing approximately \$660m to build. We have been told by our broker that adequate public liability insurance could not be obtained in Australia and that insurance over \$50m must be obtained overseas. We are not the only people

to be told this. Why should we have to address this issue and pay an unaffordable increase in premium just because LSBP has chosen a completely inappropriate place to build a solar farm? LSBP has again created a conflict with the financial costs we have to bear because of their choices.

f. *There is a Neighbourhood Benefit Program.* To keep on repeating that there is a Neighbourhood Benefit Program is deliberately misleading. Most of the adjoining and neighbouring impacted landowners will get nothing. The others will get an amount that will not cover their expenses of dealing with the dirt and pollution that will come off the construction site over 2 years and the site once operating if approved.

g. *There will be increased economic activity.* The only locals that will benefit economically from construction workers spending will be the big supermarkets, take away food shops and petrol stations. The workers will not buy clothes, shoes, cars, houses and won't be eating in restaurants. They will buy most of their bigger items online. The only contribution to the economy will be the (up to) 12.5 Goulburn workers.

h. *There will be safety concerns due to potential glint/glare from solar panels.* LSBP has frequently told us that there will be no glint or glare. What has changed? We live on a 700m hill overlooking almost 2/3 of the proposal and look south, south west and west. They have failed to provide mitigation measures to ensure that we will not be looking at a glare of panels prior to midday when the panels will be facing to the east, straight towards our house and property.

i. *There will be potential for flooding and impacts to access roads and proximal properties.* Why is LSBP allowed to undertake works on the solar land that will result in increased flooding on our place due to the accumulation of vegetation against the perimeter fence. We have a dam that is shared with the solar land. It is on a flood way that accumulates a lot of water when it rains heavily and then drains into the solar farm dam. Our current shared boundary fence collects vegetation up to the top wire. This is a farm fence that is made of wide mesh and wire which lets some vegetation and water through over time and relieves pressure on the fence. The solar farm perimeter fence will be made of small industrial mesh. The placing of the perimeter fence by LSBP across the spillway of the shared dam will result in a wall of vegetation building up against that fence during a heavy down pour and/or over time. We have seen the water on that spill way running like a river in full spate. The fence with vegetation washed from

our place and the dam surrounds will act as a dam wall and the solar factory fence will be washed away when the weight of the water builds up and the built up water will be released. The force of the water has to be seen to be believed. This will probably result in solar panels being undermined down stream.

It is noted that LSBP proposes to fill in most of the dams. Dams are built on natural water courses. Where will the water go if the dams are filled in?

j. *There will be Physical health and wellbeing impacts as a result of potential increased exposure to electromagnetic fields (EMFs) from Project infrastructure.* LSBP told us from the beginning that there was no evidence of increased electromagnetic fields. Another lie. We didn't believe them and that is the reason the second neighbour sold up. They are now admitting it. So young children and younger adults and older persons at a vulnerable stage in life will be exposed to increased electromagnetic fields. Do we have a say in this?

There must be a reliable and immediate contact within LSBP to report issues otherwise the police and the Goulburn Mulwarree Council will be contacted to deal with issues that they should not have to deal with. It currently takes us 5 days to get a reply to an email to LSBP.

Grazing Sheep.

LSBP states that it will be grazing sheep on the land once if the project is approved and is running.

The Large-Scale Solar Energy Guideline August 2022 states that the Applicants must also consider other environmental issues **and land use conflicts** when selecting a site. **This includes the agricultural productivity of the land.**

The application should be refused for the following reasons in this context:

Agricultural productivity – Meat & Livestock Australia (MLA) is the declared livestock industry marketing body and the industry research body under the *Australian Meat and Live-stock Industry Act 1997*.

Under the MLA, the LPA (Livestock Production Assurance) program is the on-farm assurance program that permits livestock producers to sell their livestock for food consumption in Australia and overseas. LPA National Vendor Declarations (NVDs)

provide evidence of livestock history and on-farm practices so that any stock with contaminants can be traced back to the property concerned.

On the latest LPA form which must be completed when a producer applies for a PIC (Property Identification Code) if they want to sell their livestock and which must be renewed every two years thereafter, under the section titled:

“LPA Accreditation Food safety on your property”

Question: 2.8 asks

“Do livestock have access to **leaking electrical transformers, capacitors**, hydraulic equipment, **solar panels**, wind turbines, coal seam gas structures or coal mine wastes?”

If the answer is “Yes” **you then have to state that you are making plans to restrict access.** Capacitors are also part of the equipment in solar farms as are transformers.

It appears therefore that a farmer grazing sheep under the solar panels may not be able to sell them for consumption.

Also, if the solar panels are damaged in a hail storm, by fire or broken during construction the neighbouring landowners’ sheep, cattle and goats will be exposed to the toxic ingredients which will be washed down the hills onto neighbouring properties because of the topography of the site. They will also be washed into the Bullamalita and Gunday Creek which are part of the Sydney Water Catchment area.

Mitigation

LSBP “mitigation” plans are unrealistic, not viable and are inadequate. They will never mitigate the impacts on and conflicts with so many houses, the topography of the land, the fire situation and the acidic soil.

It has provided no answer at all in relation to mental health or depreciation. They do not address the significant impact on our enjoyment of our land and the basic ability to live in a healthy environment when we will be inflicted with filth and dirt and with noise that significantly exceeds acceptable and healthy levels.

Ann Moore

Gunday

Echidna on neighbouring property December 2024



P